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December 15, 2023

VIA ECF

The Honorable Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: CRC Insurance Services, Inc. v. James Suh, 22-CV-09528 (AT)

Dear Judge Torres:

We represent Plaintiff CRC Insurance Services, Inc. (“CRC”) in the above-referenced action. On behalf of all parties, and in accordance with Rule I.C of Your Honor’s Individual Practices, we respectfully write to request (i) an extension of the deadline to complete fact discovery from December 22, 2023 until February 16, 2024; (ii) an extension of the deadline to complete expert discovery from February 22, 2024 until March 30, 2024; and (ii) an adjournment of the Case Management Conference scheduled for January 16, 2023 (the “Conference”) to a date subsequent to February 16, 2024 that is convenient for the Court.

Since Plaintiff submitted its prior extension request, the parties have continued to work cooperatively to complete discovery, including by significantly streamlining outstanding electronic discovery through constructive meet-and-confers. Although the parties do not presently anticipate any discovery disputes, they need to complete at least two non-party depositions – at least one of which must be conducted out-of-state – prior to completing the balance of anticipated party depositions. In light of those considerations, and the scheduling challenges that typically accompany this period of the calendar, we respectfully request the above-referenced extensions which, in the parties’ view, will afford them sufficient time to complete that discovery which remains outstanding.

Further, in light of their view that the Conference will prove more constructive if held after the completion of fact discovery, the parties respectfully request an adjournment of that appearance to a date subsequent to February 16, 2024 that is convenient for the Court.

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While Plaintiff previously submitted requests to extend the discovery deadlines, this is the parties' first joint request for such relief.

Thank you for Your Honor's consideration of these requests, and continued attention to this matter, which the parties greatly appreciate.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.



Evan B. Citron

cc: All counsel of record

GRANTED. Fact discovery shall close on **February 16, 2024**. Expert discovery shall close on **March 30, 2024**. The case management conference scheduled for January 16, 2024, is ADJOURNED to **March 5, 2024**, at **11:00 a.m.**

SO ORDERED.

Dated: December 18, 2023
New York, New York



ANALISA TORRES
United States District Judge